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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEAN SILVA,

Defendant.

CASE NO. 1:21-CR-00117-JLT-SKO

STIPULATION TO SET CHANGE OF PLEA
HEARING AND EXCLUDE TIME UNDER
SPEEDY TRIAL ACT; ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on July 20, 2022.
2. By this stipulation, defendant now moves to schedule a change of plea hearing on August 19, 2022, which will take place after the period of excludable time. The parties therefore move to have the change of plea hearing scheduled for August 19, 2022, at 9:00 a.m., and to exclude time as to defendant Dean Silva through August 19, 2022, for the reasons set forth below.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The parties have entered into a plea agreement.
 - b) Counsel for defendant desires the status conference date be vacated so that a change of plea hearing can be set in order to facilitate a resolution in this matter.
 - c) The government does not object to the continuance.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 12, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ STEPHANIE M. STOKMAN
STEPHANIE M. STOKMAN
Assistant United States Attorney

Dated: July 12, 2022

/s/ TINO PEREZ
TINO PEREZ
Counsel for Defendant
DEAN SILVA

ORDER

IT IS SO ORDERED.

DATED: 7/14/2022

Sheila K. Oberto
THE HONORABLE SHEILA K. OBERTO
UNITED STATES DISTRICT JUDGE